

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-CR-38

MARCUS A. OWENS,

Defendant.

JOINT MOTION TO ADJOURN FINAL PRETRIAL CONFERENCE AND TRIAL

The United States of America, by and through its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Benjamin W. Proctor, Assistant United States Attorney for said District, and the defendant, Marcus A. Owens, by and through his attorney, Anderson M. Gansner, hereby move the court to adjourn the final pretrial conference set for July 5, 2016, and trial set for July 11, 2016.

Based on the nature of the case, the Court has designated this matter complex. *See* Docs. 19, 20, 21. The parties and U.S. Magistrate Judge assigned to this case have been working to address and resolve additional discovery requests. *See* Docs. 24, 25, 26, 27, 33, 34. The defendant has engaged a computer forensic consultant and has indicated he anticipates filing pretrial motions. With this in mind, the Magistrate Judge has proposed a new pretrial motion deadline under which motions are due August 1, 2016, with responses due August 15, 2016, and replies due August 22, 2016. Doc. 34.

The parties jointly request that the district court adjourn the final pretrial conference and trial dates to accommodate the new pretrial motion schedule. In addition, the parties acknowledge that depending on how the Magistrate Judge resolves the motion(s), a party will likely seek review of the decision by the District Court Judge under Fed. R. Crim. P. 59. In order to accommodate all anticipated briefing in this matter, along with time for the Court to consider arguments and issue

decisions, the parties suggest that a new trial date be set for October or November 2016.

Defense counsel Anderson Gansner reviewed and approved the statements above prior to filing.

Dated at Milwaukee, Wisconsin this 23rd day of June, 2016.

Respectfully submitted,

GREGORY J. HAANSTAD
United States Attorney

By s/

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